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## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

two Facebook accounts, more particularly described in  
Attachment A

Case No. 3:20-mj-05219

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

two Facebook accounts, more particularly described in Attachment A,

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated by reference herein.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

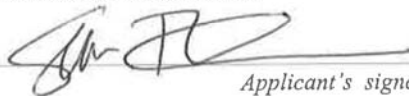
The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841a, 846	Drug trafficking and conspiracy

The application is based on these facts:

See attached Affidavit of FBI Special Agent Sean Thornton, incorporated by reference herein.

- ☒ Continued on the attached sheet.  
☒ Delayed notice of 90 days (give exact ending date if more than 30 days: 12/16/2020) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



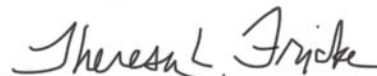
Applicant's signature

Sean Thornton, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
 telephone appearance (specify reliable electronic means).

Date: 9-17-2020



Judge's signature

City and state: Tacoma, Washington

Theresa L. Fricke, United States Magistrate Judge

Printed name and title

[USA02018RN1199]

# AFFIDAVIT

[illegible]

I, SEAN THORNTON, being first duly sworn, hereby depose and state as follows:

## INTRODUCTION AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

2. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since May of 2017. I am currently assigned to FBI Seattle Division's Vancouver Resident Agency (VRA) in Vancouver, Washington, focusing on the investigation of organized crime, gangs, drug trafficking, and other criminal matters.

3. Since becoming a Special Agent, I have received specialized training from the FBI, to include completing the 21-week New Agent Training course at the FBI Academy. I have also received training in investigative methods to trace illegal proceeds and prove financial crimes, money laundering, and conduct asset forfeiture. I have participated in multiple drug investigations targeting large scale drug trafficking organizations (DTOs) as the case agent or as an investigating agent. During my tenure as an agent, I have been involved in federal and state wiretap investigations. I have debriefed defendants and witnesses who had personal knowledge regarding drug trafficking organizations. Additionally, I have participated in many aspects of drug investigations, including conducting physical surveillance, confidential source management, providing grand jury testimony, preparing search warrant affidavits, executing search warrants, and making arrests.

4. Based upon my training and experience, I am familiar with drug traffickers' methods of operation, including their methods of distribution, storage, and transportation

1 of drugs, their methods of collecting proceeds of drug trafficking, and their methods of  
2 laundering money. I am also familiar with methods employed by large-scale DTOs to  
3 avoid detection by law enforcement, including the use of cellular telephone technology,  
4 text messages, counter surveillance, false or fictitious identities, and encoded  
5 communications.

6 5. The information contained in this affidavit is based upon knowledge I  
7 gained from my investigation, my personal observations, my training and experience, and  
8 information provided by other law enforcement officers, agents, or analysts. This  
9 affidavit is intended to show merely that there is sufficient probable cause for the  
10 requested warrant and pen-trap, and therefore does not set forth all of my knowledge  
11 about this matter.

12 6. Based on the facts set forth in this affidavit, there is probable cause to  
13 believe that violations of 21 U.S.C. §§ 841(a)(1) and 846 (Distribution of Controlled  
14 Substances and Conspiracy) have been committed, are being committed, and will  
15 continue to be committed by Alfredo VALDOVINOS-DIAZ, Cosme SANCHEZ-  
16 ESPINO, and others known and unknown. As set forth below, there is also probable  
17 cause to believe that evidence of the same will be found in the Facebook accounts used  
18 by VALDOVINOS-DIAZ and SANCHEZ-ESPINO.

19 **PURPOSE OF AFFIDAVIT**

20 7. This affidavit is submitted in support of an application for a search warrant  
21 under Title 18, United States Code, Sections 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A)  
22 to require Facebook to disclose to the government records and other information in its  
23 possession, pertaining to the subscriber or customer associated with the following two  
24 Facebook accounts (the "SUBJECT ACCOUNTS") as described in Attachment A:

- 25 • SUBJECT ACCOUNT 1 ("SA-1"): the Facebook account with Facebook  
26 user ID 100028611992719, registered under the name "Jose LOPEZ"; and  
27  
28



- SUBJECT ACCOUNT-2 (“SA-2”): the Facebook account with Facebook user ID 100027651644395, registered under the name “AV DIAZ.”

8. All of the requested information is stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment B. This is the fourth application for a search warrant of SA-1 and second application for a search warrant of SA-2 in this investigation.

9. This affidavit is made in support of an application for a warrant under Fed. R. Crim. P. 41, 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), 2703(c)(1)(A) and 2703(d)<sup>1</sup> to require Facebook to disclose to the government copies of the information (including the content of communications) described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, law enforcement agents and/or individuals assisting law enforcement and acting at their direction will review that information to locate the items described in Section II of Attachment B. Attachments A and B are incorporated herein by reference.

10. As described more fully below, I respectfully submit there is probable cause to believe that the information associated with SA-1 and SA-2 constitutes evidence, contraband, fruits, or instrumentalities of criminal violations of Title 21, United States Code, Sections 841(a)(1), 846 (distribution of controlled substances and conspiracy), 960 and 963 (importation of controlled substances and conspiracy) committed by Alfredo VALDOVINOS-DIAZ, Cosme SANCHEZ-ESPINO, and others known and unknown.

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<sup>1</sup> The government is also seeking non-content records pursuant to 18 U.S.C. § 2703(d). To obtain the basic subscriber information, which does not contain content, the government needs only a subpoena. See 18 U.S.C. § 2703(c)(1), (c)(2). To obtain additional records and other information--but not content--pertaining to subscribers of an electronic communications service or remote computing service, the government must comply with the dictates of section 2703(c)(1)(B), which requires the government to supply specific and articulable facts showing that there are reasonable grounds to believe that the records or other information sought are relevant and material to an ongoing criminal investigation in order to obtain an order pursuant to 18 U.S.C. § 2703(d). The requested warrant calls for both records containing content (see Attachment B paragraph II.10.a.) as well as subscriber records and other records and information that do not contain content (see Attachment B paragraph II.10.b.).



**FACEBOOK INFORMATION STORAGE**

11. I am aware from my experience and training, and consultation with other investigators, of the following information about Facebook.

12. Facebook owns and operates a free-access social networking website of the same name, accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

13. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail address(es), Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

14. Facebook's terms of use generally requires users to provide true names and other identifiers, and generally prohibits individuals from creating multiple personal accounts. However, Facebook does not appear to meaningfully enforce these requirements. I know from my training and experience that many illicit Facebook users (and even some legitimate users) will create, maintain and use multiple accounts under multiple names.

15. I know from speaking with other law enforcement that "cookies" are small files placed by a server (such as those used by Facebook) on a device to track the user and potentially verify a user's authentication status across multiple sites or webpages. This cookie could be unique to a particular account (e.g., the Facebook account) or to a given device (e.g., the particular phone used to access the Facebook account). The next time a user visits a particular site or server, the server will ask for certain cookies to see if the server has interacted with that user before. Cookies can also

1 be used to determine “machine cookie overlap,” or multiple accounts that have been  
2 accessed by the same individual machine (e.g., two Facebook accounts that have been  
3 accessed on the same phone). The machine cookie overlap thus allows Facebook to track  
4 accounts that are “linked” to each other because the same user account (username on a  
5 computer) on the same device accessed multiple Facebook accounts. This can identify  
6 either multiple Facebook accounts used by the same person or used by different people  
7 sharing the same user account and device. In either case, the machine cookie overlap  
8 means that the users of the linked accounts are the same person or two people in close  
9 proximity to each other (by virtue of them using the same device).

10 16. Facebook users may join one or more groups or networks to connect and  
11 interact with other users who are members of the same group or network. Facebook  
12 assigns a group identification number to each group. A Facebook user can also connect  
13 directly with individual Facebook users by sending each user a “Friend Request.” If the  
14 recipient of a “Friend Request” accepts the request, then the two users will become  
15 “Friends” for purposes of Facebook and can exchange communications or view  
16 information about each other. Each Facebook user’s account includes a list of that user’s  
17 “Friends” and a “News Feed,” which highlights information about the user’s “Friends,”  
18 such as profile changes, upcoming events, and birthdays.

19 17. Facebook users can select different levels of privacy for the  
20 communications and information associated with their Facebook accounts. By adjusting  
21 these privacy settings, a Facebook user can make information available only to himself or  
22 herself, to particular Facebook users, or to anyone with access to the Internet, including  
23 people who are not Facebook users. A Facebook user can also create “lists” of Facebook  
24 friends to facilitate the application of these privacy settings. Facebook accounts also  
25 include other account settings that users can adjust to control, for example, the types of  
26 notifications they receive from Facebook.

27 18. Facebook users can create profiles that include photographs, lists of  
28 personal interests, and other information. Facebook users can also post “status” updates



1 about their whereabouts and actions, as well as links to videos, photographs, articles, and  
2 other items available elsewhere on the Internet. Facebook users can also post information  
3 about upcoming “events,” such as social occasions, by listing the event’s time, location,  
4 host, and guest list. In addition, Facebook users can “check in” to particular locations or  
5 add their geographic locations to their Facebook posts, thereby revealing their geographic  
6 locations at particular dates and times. A particular user’s profile page also includes a  
7 “Wall,” which is a space where the user and his or her “Friends” can post messages,  
8 attachments, and links that will typically be visible to anyone who can view the user’s  
9 profile.

10 19. Facebook allows users to upload photos and videos. It also provides users  
11 the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is  
12 tagged in a photo or video, he or she receives a notification of the tag and a link to see the  
13 photo or video. For Facebook’s purposes, the photos and videos associated with a user’s  
14 account will include all photos and videos uploaded by that user that have not been  
15 deleted, as well as all photos and videos uploaded by any user that have that user tagged  
16 in them.

17 20. Facebook users can exchange private messages on Facebook with other  
18 users. These messages, which are similar to e-mail messages, are sent to the recipient’s  
19 “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well  
20 as other information. Facebook users can also post comments on the Facebook profiles  
21 of other users or on their own profiles; such comments are typically associated with a  
22 specific posting or item on the profile. In addition, Facebook has a Chat feature that  
23 allows users to send and receive instant messages through Facebook. These chat  
24 communications are stored in the chat history for the account. Facebook also has a Video  
25 Calling feature, and although Facebook does not record the calls themselves, it does keep  
26 records of the date of each call.

27 21. If a Facebook user does not want to interact with another user on Facebook,  
28 the first user can “block” the second user from seeing his or her account.



1           22. Facebook has a search function that enables its users to search Facebook for  
2 keywords, usernames, or pages, among other things.

3           23. Each Facebook account has an activity log, which is a list of the user's  
4 posts and other Facebook activities from the inception of the account to the present. The  
5 activity log includes stories and photos that the user has been tagged in, as well as  
6 connections made through the account, such as "liking" a Facebook page or adding  
7 someone as a friend. The activity log is visible to the user but cannot be viewed by  
8 people who visit the user's Facebook page.

9           24. Facebook Notes is a blogging feature available to Facebook users, and it  
10 enables users to write and post notes or personal web logs ("blogs"), or to import their  
11 blogs from other services, such as Xanga, LiveJournal, and Blogger.

12           25. In addition to the applications described above, Facebook also provides its  
13 users with access to thousands of other applications on the Facebook platform. When a  
14 Facebook user accesses or uses one of these applications, an update about that the user's  
15 access or use of that application may appear on the user's profile page.

16           26. Some Facebook pages are affiliated with groups of users, rather than one  
17 individual user. Membership in the group is monitored and regulated by the  
18 administrator or head of the group, who can invite new members and reject or accept  
19 requests by users to enter. Facebook can identify all users who are currently registered to  
20 a particular group and can identify the administrator and/or creator of the group.  
21 Facebook uses the term "Group Contact Info" to describe the contact information for the  
22 group's creator and/or administrator, as well as a PDF of the current status of the group  
23 profile page.

24           27. Facebook uses the term "Neoprint" to describe an expanded view of a given  
25 user profile. The "Neoprint" for a given user can include the following information from  
26 the user's profile: profile contact information; News Feed information; status  
27 updates; links to videos, photographs, articles, and other items; Notes; Wall postings;  
28 friend lists, including the friends' Facebook user identification numbers; groups and

1 networks of which the user is a member, including the groups' Facebook group  
2 identification numbers; future and past event postings; rejected "Friend" requests;  
3 comments; gifts; pokes; tags; and information about the user's access and use of  
4 Facebook applications.

5 28. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP  
6 address. These logs may contain information about the actions taken by the user ID or IP  
7 address on Facebook, including information about the type of action, the date and time of  
8 the action, and the user ID and IP address associated with the action. For example, if a  
9 user views a Facebook profile, that user's IP log would reflect the fact that the user  
10 viewed the profile, and would show when and from what IP address the user did so.

11 29. Social networking providers like Facebook typically retain additional  
12 information about their users' accounts, such as information about the length of service  
13 (including start date), the types of service utilized, and the means and source of any  
14 payments associated with the service (including any credit card or bank account number).  
15 In some cases, Facebook users may communicate directly with Facebook about issues  
16 relating to their accounts, such as technical problems, billing inquiries, or complaints  
17 from other users. Social networking providers like Facebook typically retain records  
18 about such communications, including records of contacts between the user and the  
19 provider's support services, as well as records of any actions taken by the provider or  
20 user as a result of the communications.

21 30. Therefore, the computers of Facebook are likely to contain all the material  
22 described above, including stored electronic communications and information concerning  
23 subscribers and their use of Facebook, such as account access information, transaction  
24 information, and other account information. I believe such information is likely to  
25 constitute evidence of the drug trafficking crimes currently under investigation.

#### 26 SUMMARY OF PROBABLE CAUSE

27 31. The information set forth in this affidavit consists of information I have  
28 gathered and observed firsthand through the course of this investigation to date, as well



1 as information relayed to me by other law enforcement personnel, my review of law  
2 enforcement reports, interviews of witnesses, and my review and analysis of toll records.  
3 Since I am submitting this Affidavit for the limited purpose of obtaining authorization to  
4 search the SUBJECT ACCOUNTS as described herein, I have not included every fact  
5 known to me concerning this investigation. I have set forth only the facts that I believe  
6 are essential to establish the necessary foundation for the issuance of such warrant.

7 32. The United States, including the FBI, is conducting a criminal investigation  
8 of Alfredo VALDOVINOS-DIAZ, Cosme SANCHEZ-ESPINO, and others known and  
9 unknown, regarding possible violations of 21 U.S.C. §§ 841(a)(1) and 846. FBI agents  
10 based in Vancouver, Washington, and members of the Southwest Washington  
11 Interagency Gang Enforcement Team (SWIGET), the Clark Vancouver Regional Drug  
12 Task Force (CVRDTF), and Vancouver Police Department (VPD) have been  
13 investigating a Drug Trafficking Organization (DTO) operating in the Vancouver area.  
14 The DTO appears to be headed by Alfredo VALDOVINOS-DIAZ, who is currently  
15 incarcerated at Great Plains Federal Correctional Institute (FCI), a federal contract  
16 facility in Hinton, Oklahoma, serving a 96-month prison sentence imposed on June 8,  
17 2015, in cause number CR14-05159BHS-004 (Western District of Washington), for  
18 Conspiracy to Distribute Methamphetamine.

19 33. Another member of the VALDOVINOS-DIAZ DTO identified in this  
20 investigation is Cosme SANCHEZ-ESPINO. SANCHEZ-ESPINO is also an inmate at  
21 Great Plains FCI, serving a 188-month sentence imposed on July 9, 2008, in cause  
22 number CR07-29-H-DWM (District of Montana), for Conspiracy to Distribute  
23 Methamphetamine.

24 34. As set forth below, I believe there is probable cause to believe that  
25 VALDOVINOS-DIAZ and SANCHEZ-ESPINO have possessed and used contraband  
26 cellular phones with Facebook accounts to direct drug trafficking activities of their co-  
27 conspirators, during their respective periods of incarceration.  
28



1        35. Through search warrants, post-*Miranda* interviews, information provided  
2 by sources of information and confidential informants, and telephone toll analysis,  
3 investigators have identified around a dozen individuals who have historically been  
4 associated with the VALDOVINOS-DIAZ DTO, and with VALDOVINOS-DIAZ and  
5 SANCHEZ-ESPINO.

6        ***November 17, 2019, Seizure of Methamphetamine from Brittney JONES***

7        36. On November 17, 2019, CVRDTF Detective Erik Zimmerman learned that  
8 a vehicle associated with Brittney JONES was returning to Washington from California.  
9 Det. Zimmerman suspected that Brittney JONES, a Vancouver, Washington, resident,  
10 was a methamphetamine dealer, and believed it was likely that she was traveling with  
11 narcotics concealed in her vehicle. Investigators obtained the license plate numbers and  
12 vehicle descriptions for all of the vehicles registered to her in the Washington  
13 Department of Licensing (DOL) database. Through law enforcement databases,  
14 investigators learned that a 2010 Nissan Rogue (bearing Washington license BQC4189)  
15 owned by Brittney JONES had been in California on three separate occasions since  
16 September 2019. Based upon my training, knowledge, and experience I am aware that  
17 California is the primary source for narcotics in the Vancouver area.

18        37. At about 6:50pm on Sunday, November 17, 2019, Medford Area Drug &  
19 Gang Enforcement (MADGE) Task Force investigators observed the Nissan traveling  
20 northbound on Interstate 5 in the area of Medford, Oregon, through physical surveillance.  
21 CVRDTF investigators located the vehicle through the utilization of GPS location data  
22 (obtained with authorization in state court), and conducted a traffic stop when the Nissan  
23 arrived in Vancouver, Washington. Brittney JONES, Brent JONES (Brittney JONES'  
24 brother), and Brittney JONES' two children were in the car.

25        38. Brittney JONES provided consent to CVRDTF Detective Robert Anderson  
26 to conduct an exterior K9 sniff of her vehicle. Detective Anderson deployed his K9, who  
27  
28

1 gave a positive alert for the odor of narcotics.<sup>2</sup> Brittney JONES also provided consent to  
2 a search of the Nissan. Detectives found no drugs during the consent search, but saw that  
3 the Nissan showed signs it had been altered. It should be noted that the consent search  
4 did not include a thorough search of the vehicle's undercarriage, door panels, dash  
5 compartment, or areas within the seats.

6 39. Det. Anderson deployed his K9 once again to sniff all of the property  
7 removed from the vehicle, and the K9 did not give a positive alert. Det. Anderson  
8 deployed his K9 inside the vehicle, where the K9 did give a positive alert near the dash  
9 area. Detectives noticed that Brittney JONES was using her cellular phone to send  
10 messages during the traffic stop and search.

11 40. Detectives secured the Nissan and towed it to a secure location pending an  
12 application for a search warrant to conduct a more thorough search. On Tuesday,  
13 November 19, 2019, Clark County District Judge Chad E. Sleight authorized a search  
14 warrant. Investigators subsequently conducted a more thorough search of the vehicle.

15 41. Investigators removed both front seats from the vehicle and located  
16 compartments accessible by the removal of a steel plate. From within both  
17 compartments, investigators located a combined total of 57 pounds of methamphetamine.  
18 The street value of the seized methamphetamine is roughly \$270,000, if sold in one-  
19 ounce increments at \$300 per ounce, which I know to be a consistent price for the drug in  
20 the Vancouver area at the time.

21 42. Det. Zimmerman received information from a Confidential Reliable  
22 Informant ("CRI-1"<sup>3</sup>) regarding this investigation. CRI-1 was aware law enforcement  
23

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24 <sup>2</sup> Detective Anderson's assigned K9 'Piper' has been a certified narcotics detection K9 since October 16, 2015,  
25 being specifically and solely trained to detect the odor of illegal narcotics, specifically methamphetamine, cocaine,  
26 and heroin, after completing over 200 hours of training per Washington Administrative Code (WAC) 139-05-0915.  
27 Additional certifications include PNWK9 on May 20, 2016, and re-certifications under Washington Criminal Justice  
28 Training Center (CJTC) standards on June 19, 2019, and PNWK9 standards on May 24, 2019. Current certifications  
under CJTC standards are valid for 24 months.

<sup>3</sup> I am intentionally being vague to avoid possibly revealing CRI-1's true identity, in hopes of avoiding possible  
retribution against CRI-1 from DTO members. CRI-1 has admitted to purchasing, selling, and using



1 had seized the methamphetamine from Brittney JONES' vehicle, and informed Det.  
2 Zimmerman that Brittney JONES was working for another individual. CRI-1 described  
3 this individual as an unknown Hispanic male who utilized a cellular phone (voice and  
4 text), and Facebook messenger to communicate. CRI-1 identified the name on the  
5 Facebook account of this unknown Hispanic male as "Jose LOPEZ" (SA-1). CRI-1 had  
6 previously purchased methamphetamine directly from Brittney JONES on multiple  
7 occasions; the transactions were facilitated through the Hispanic male.

8 *Execution of Search Warrants on January 15, 2020*

9 43. On January 15, 2020, CVRDTF detectives executed search warrants at  
10 4619 NE 112th Avenue, #K205, Vancouver, Washington (Brittney JONES' apartment),  
11 and at 1428 N 3rd Avenue, Kelso, Washington (Brent JONES' primary address).  
12 Detectives found no drug evidence within Brent JONES' residence in Kelso. At Brittney  
13 JONES' residence in Vancouver, detectives located approximately 500 pills and what  
14 appeared to be a drug ledger. The Washington State Patrol laboratory has conducted  
15 testing on a representative sample of the pills and confirmed they contain Fentanyl.

16 44. Prior to the execution of the warrant at her apartment, detectives contacted  
17 Brittney JONES at her place of employment and notified her that a search warrant would  
18 be executed. Detectives told Brittney JONES she was welcome to accompany them to  
19 the apartment. Brittney JONES agreed, and engaged in a non-Mirandized interview with  
20 Det. Zimmerman. During that interview, Brittney JONES confirmed her involvement in  
21 the ongoing possession and distribution of controlled substances. Brittney JONES further  
22 confirmed that she has traveled to California on multiple occasions to pick up bulk  
23 methamphetamine for distribution in the Vancouver area, and would personally access  
24

25 \_\_\_\_\_  
26 methamphetamine, as well as to being familiar with how drugs are packaged, sold, transported, and consumed.  
27 CRI-1 is motivated to assist law enforcement in return for favorable consideration regarding a pending charge of  
28 possession of a controlled substance. CRI-1 has numerous felony convictions, and has provided consistent and  
substantial assistance to law enforcement. The crimes CRI-1 has been convicted of do not include crimes of  
dishonesty or deception.



1 the hidden compartments in the Nissan to remove the methamphetamine while the  
2 vehicle was parked in her garage.

3 45. Brittney JONES was in possession of a cellular phone and provided  
4 detectives with the passcode to allow them to manually search the phone. Detectives  
5 observed the Facebook user/account "Jose LOPEZ" (SA-1) as a friend/contact of Brittney  
6 JONES' Facebook account. There was no photograph on SA-1's home page, and SA-1  
7 had a total of 75 friends. Brittney JONES' association with SA-1 corroborated the  
8 information detectives had received from CRI-1.

9 46. On January 24, 2020, CVRDTF detectives arrested Brittney JONES for  
10 possession of controlled substances with intent to distribute, in reference to the 57-pound  
11 methamphetamine seizure in November 2019. She was booked into the Clark County  
12 Jail, and posted bail within a few days. The matter is pending in Clark County Superior  
13 Court, with a trial date set in December 2020.

14 *Interview of Two Vancouver Residents – February 4, 2020*

15 47. On or about February 4, 2020, Det. Zimmerman contacted two individuals  
16 who volunteered information regarding Brittney JONES' involvement in  
17 methamphetamine trafficking. The individuals were interviewed separately, and both  
18 provided information that detectives previously knew to be accurate and considered  
19 credible.<sup>4</sup>

20 48. Both citizens said Brittney JONES works on behalf of a Hispanic male,  
21 organizing transfers of methamphetamine from California to Washington. This Hispanic  
22 male is also involved in organizing the day-to-day transactions of methamphetamine with  
23 buyers. The individuals identified the Hispanic male as "Cosme," and said he was  
24 allegedly incarcerated in an Oklahoma federal prison for drug offenses related to a  
25

26  
27 <sup>4</sup> Det. Zimmerman is aware of the true identities of the two individuals. However, considering the nature of the  
28 crime being investigated, specifically the significant quantities of methamphetamine being trafficked (presumably  
by a Mexican cartel), those providing information to law enforcement are placing themselves in considerable risk of  
harm. Thus, I have not included the true identities of these individuals in this affidavit.

1 Montana federal investigation. The individuals stated that, while incarcerated, “Cosme”  
2 is utilizing a contraband cellular phone to communicate via voice and text, as well as via  
3 Facebook messenger. One of the individuals explained how the vehicles utilized have  
4 sophisticated secret compartments (or traps) to conceal the methamphetamine. The  
5 second individual said s/he and others would also have drug-related communications with  
6 “Cosme” through his Facebook account, which s/he identified as being in the name “Jose  
7 LOPEZ” (SA-1).

8 ***Linkage of SA-1 to Cosme SANCHEZ-ESPINO***

9 49. On or about February 6, 2020, investigators learned of an inmate named  
10 Cosme SANCHEZ-ESPINO, incarcerated at Great Plains FCI located in Hinton, OK, for  
11 conspiracy to distribute methamphetamine. The underlying investigation/prosecution  
12 took place in Montana. Investigators obtained SANCHEZ-ESPINO’s booking  
13 photograph and showed it to one of the two individuals Det. Zimmerman spoke with  
14 (described above). That individual positively identified SANCHEZ-ESPINO as the  
15 person s/he had referred to as “Cosme,” the user of the “Jose LOPEZ” Facebook account  
16 (SA-1).

17 50. Based on my training and experience, I am aware that each Facebook  
18 account has a unique account ID number. The unique account ID number associated with  
19 SA-1 is 100028611992719, and SA-1 shows a creation date of September 9, 2018.

20 51. On February 14, 2020, CVRDTF investigators sent a preservation request  
21 to Facebook to preserve all records related to SA-1 (Facebook preservation case number  
22 4516758), specifically, all data between the dates of November 1, 2019, and February 15,  
23 2020. These dates were chosen to cover the 57-pound methamphetamine seizure from  
24 Brittney JONES on November 17, 2019, the fentanyl seizure from Brittney JONES’  
25 apartment on January 15, 2020, and Brittney JONES’ arrest on January 24, 2020.

26 52. On March 5, 2020, Clark County Superior Court Judge Scott Collier  
27 authorized a search warrant for Facebook records related to SA-1. Detectives received  
28 the records (covering a date range of November 1, 2019, to February 14, 2020) from



Facebook on March 11, 2020. Much of the communication (messages) sent to/from SA-1 was in Spanish. CVRDTF Detective Rodrigo Osorio, a fluent Spanish speaker, translated the material. Some examples of those messages (in their translation to English) are set forth below.

- On November 18, 2019, at 7:11am UTC (which corresponds to November 17, 2019, at 11:11pm PST), SA-1 sent a message to “Jorge Espino” (Facebook ID 100004474154636) that read, “They stopped her check on her.” In the next message, SA-1 said, “She is close to the house,” and “she is telling me they are drug cops.” At 7:13am UTC (11:13pm PST), Jorge Espino responded and said, “yes, she is close to home” and “she has been stopped for 9 minutes.” SA-1 then asked Jorge Espino if he can hear anything. Jorge Espino said nothing can be heard, and all he can see is that the vehicle is parked in a store parking lot.
- At 7:20am UTC (11:20pm PST), SA-1 said, “she saw my message” and then said, “it’s all fucked up.” SA-1 said, “she says they are using the dog,” and then messages went back and forth between SA-1 and Jorge Espino as SA-1 asked Jorge Espino to keep checking on it.

53. Investigators believe Jorge Espino is Cosme SANCHEZ-ESPINO’s brother, Jorge Sanchez-Espino. Based on the conversation between SA-1 and Jorge Espino, it is apparent they are referring to someone being pulled over, and, further, that Jorge Espino can see where the car is and is able to hear what is going on around the vehicle. As noted above, Brittney JONES was using her cellular phone during the traffic stop and search. Investigators believe Brittney JONES was in communication with SANCHEZ-ESPINO, via SA-1, during the traffic stop and this accounts for SANCHEZ-ESPINO’s knowledge of events as they unfolded (e.g., “she is telling me they are drug cops”). Investigators also believe that Jorge Espino was monitoring some sort of GPS device on Brittney JONES’ vehicle, which accounts for his knowledge of where the vehicle was located (e.g., “she has been stopped for 9 minutes” and stating the vehicle



1 was in a parking lot). The GPS device also appears to have audio and video capability.  
2 Investigators later located a GPS device capable of also recording or relaying interior  
3 audio, affixed to the interior of Brittney JONES' Nissan Rogue, hard-wired to the  
4 vehicle's power supply.

5 54. Additional messages in this same string (i.e., corresponding to the  
6 November 17, 2019, traffic stop of Brittney JONES) between SA-1 and Jorge Espino  
7 include the following:

- 8 • At 7:49am UTC (11:49pm PST), SA-1 asked, "how hard is it to open that up?"  
9 Jorge Espino replied, "they have to move the chairs" [likely meaning to remove  
10 the seats].
- 11 • At one point, Jorge Espino said the vehicle is moving to the north in "vancuber"  
12 [sic] and sent SA-1 a photo depicting a satellite view map. The map showed a  
13 vehicle icon (named "Rogue") in the parking lot of the Clark County Sheriff's  
14 Office vehicle maintenance yard.
- 15 • Jorge Espino later asked if they let the "donkey/mule" go, and if the  
16 "donkey/mule" had called SA-1. SA-1 replied and said, "yes, I just hung up with  
17 her."

18 55. Based on my knowledge of this investigation, as well as on other Facebook  
19 messages discussed in this affidavit, I believe SANCHEZ-ESPINO (using SA-1) and his  
20 brother, Jorge Espino, were talking about the CVRDTF traffic stop of Brittney JONES on  
21 November 17, 2019, and the 57 pounds of methamphetamine in a hidden compartment  
22 under the seats ("the chairs") of the Nissan Rogue Brittney JONES was driving.

23 56. Additional messages of interest in SA-1 that investigators received through  
24 the above-described search warrant included one on December 31, 2019, in which Jorge  
25 Espino told SA-1, "hey it's going to be in that girl's brother's name. The lady told me  
26 that it will be ready on Thursday and that on Friday they will do the Smog test and that  
27 same day they will provide the plates." It appeared Jorge Espino was referring to a  
28

1 vehicle that would be registered to a female's brother. Based on my knowledge of facts  
2 in this investigation, I know that a Ford Edge (bearing California plate 8NPM751) is  
3 registered to Brent JONES (Brittney JONES' brother) and believe this is the vehicle  
4 Jorge Espino was referring to. California Department of Motor Vehicles records show  
5 the vehicle's registration became effective on Friday January 3, 2020, which corresponds  
6 with the timeline established in the messages. As described later in this affidavit,  
7 CVRDTF detectives would locate 25 pounds of methamphetamine in a hidden  
8 compartment in this vehicle.

9 57. Another message of interest in SA-1 was dated January 15, 2020, at 9:37pm  
10 UTC (1:37pm PST). In this message, SA-1 told Jorge Espino, "she is telling me that they  
11 are checking the apartment." I believe this was a reference to execution of the CVRDTF  
12 search warrant at Brittney JONES' apartment on January 15, 2020. At 1:01am UTC on  
13 January 18, 2020 (5:01pm PST on January 17, 2020), SA-1 said, "the only thing is that  
14 they did find the fucking/bitch candies." I believe this was a reference to the Fentanyl  
15 pills found in Brittney JONES' apartment.

16 ***Discussion of Methamphetamine Shipment in February 2020***

17 58. Included in the materials received from Facebook pursuant to this first  
18 search warrant on SA-1 was series of messages between SA-1 and a user named "Shana  
19 BeauBeaux" that began on February 5, 2020. Review of this Facebook profile leads me  
20 to believe this is Shana BOBO, based on comparison with a Washington State DOL  
21 photograph of BOBO. It is also my belief, based on my training and experience, that  
22 "BeauBeaux" is an alternate spelling for BOBO, to avoid detection of the Facebook  
23 account by law enforcement.

24 59. I reviewed criminal history records for BOBO, and found that she has four  
25 felony convictions for drug-related offenses. The criminal history also shows multiple  
26 aliases used when contacted by law enforcement. These aliases include "Shawna Bobo"  
27 and "Shana Kalberer," to name a few.  
28



1       60. On February 6, 2020 at 9:50am UTC (1:50am PST), SA-1 told BOBO,  
2 “call brittney in the morning.” SA-1 then said, “she well tell you wher to go and get the  
3 car in the paper.” I believe SA-1 was telling BOBO to contact Brittney JONES.

4       61. SA-1 sent a message to “Rocio Gomez” (who appears from the context of  
5 other messages in SA-1 to be SANCHEZ-ESPINO’s girlfriend) on February 7, 2020, at  
6 4:36pm UTC (8:36am PST), in which SA-1 told her that “the people that I sent are new  
7 they left yesterday at noon and they are still not even to California when they were  
8 supposed to almost be there.” I believe SANCHEZ-ESPINO was stating that he sent new  
9 drug couriers (i.e., not Brittney JONES and/or her brother, Brent JONES) to California to  
10 obtain a load of narcotics for shipment to Washington. I further believe (for the reasons  
11 described below) these new couriers were BOBO and Kyle Gojio. Additional messages  
12 between SA-1 and Jorge Espino discussed someone going “down” (to California),  
13 stopping in Salem (Oregon) to stay at a hotel, and that they were not traveling very fast.  
14 On February 7, 2020, at 6:54pm UTC (10:54am PST), SA-1 told Jorge Espino the people  
15 driving the car were going to “Long Beach” (California). Jorge Espino later said they  
16 had to stop to let the dogs out. It appeared from the messages that this vehicle, like  
17 Brittney JONES’ Nissan Rogue, might have a GPS tracker/audio device installed in it;  
18 investigators would later confirm this to be true.

19       62. A law enforcement database showed that on February 8 and 9, 2020, the  
20 Ford Edge (bearing California plate 8NPM751) was in California. Based on this  
21 information, it appears SA-1 and Jorge Espino were likely referring to this vehicle as the  
22 one traveling to California to pick up a load of narcotics.

23       63. The messages in SA-1 continued on February 10, 2020, at 6:02pm UTC  
24 (10:02am PST), when Jorge Espino said “they” were almost to Oregon. SA-1 had asked  
25 for the location of the vehicle, and Jorge Espino sent SA-1 a satellite view map (image-  
26 470816987128723) showing the icon of a silver vehicle (labeled “Edge”) on Hwy 101,  
27 northwest of Mendocino National Forest and south of Eureka, California.  
28

64. On February 11, 2020, at 11:01am UTC (3:01am PST), Jorge Espino said “the donkey/mule” finally showed up and that it was about two hours from Astoria (Oregon). Based on my training and experience, as well as knowledge of this investigation, I believe that “the donkey/mule” is coded language referring to the vehicle and its occupants.

65. Then, on February 12, 2020, SA-1 told Jorge Espino to tell the “cousin” that there was “work” there now in case they need it. Based on my experience I know that drug dealers often times refer to drugs as “work,” and believe this to be confirmation that a load of drugs arrived in Western Washington for distribution.

66. Between February 6 and February 14, 2020 (the ending date for the materials provided by Facebook pursuant to the first search warrant), SA-1 and BOBO communicated with each other multiple times, including multiple video chats.

***March 17, 2019, Seizure of Methamphetamine from Shana BOBO***

67. Between the dates of February 25 and 27, 2020 CVRDTF Det. Zimmerman met with an informant who claimed to be able to purchase methamphetamine from Brent JONES. Detective Zimmerman was previously aware Brent JONES resided at 1428 3rd Avenue N, Kelso, Washington. The informant made contact with Brent JONES at 360-751-3103 to arrange the transaction.

68. Prior to the transaction, investigators thoroughly searched the informant and his/her vehicle for money, drugs, and other contraband; they found none. The informant was provided with a sum of US currency (serial numbers recorded) to purchase the methamphetamine. Detectives kept the informant under constant surveillance as s/he traveled to the location where the transaction was set to take place. The informant met Brent JONES in a public place, and the transaction occurred under law enforcement surveillance. Brent JONES utilized a silver 2007 Ford Edge bearing California license plate 8NPM751, registered in his name, to complete the transaction.

69. Following the transaction, investigators followed the informant to a predetermined location. The informant provided Det. Zimmerman with a package



1 containing a quantity of suspected methamphetamine consistent with the amount of US  
2 currency investigators had provided. The suspected methamphetamine field-tested  
3 positive for the presence of methamphetamine. Investigators searched the informant and  
4 his/her vehicle following the transaction for money, drugs, or other contraband, none of  
5 which were found.

6 70. Other investigators kept Brent JONES under surveillance and saw him  
7 returning to the Kelso residence listed above.

8 71. On February 27, 2020, Clark County Superior Court Judge Scott Collier  
9 authorized the installation of a GPS device on the silver 2007 Ford Edge bearing  
10 California license plate 8NPM751. The device was installed on February 28, 2020.

11 72. On March 17, 2020, at approximately 6:45pm, investigators from CVRDTF  
12 and the Clackamas County Interagency Task Force (CCITF) located the Ford Edge in  
13 Canyonville, Oregon. Law enforcement then followed the vehicle from Canyonville,  
14 Oregon, to the Oregon coast area. The vehicle had been traveling northbound on  
15 Interstate 5 before taking exit 136 near Sutherlin to travel westbound on Route 138  
16 towards Elkton, Oregon. The vehicle continued onto Route 38 traveling westbound  
17 toward Reedsport, Oregon. The vehicle then traveled north on Route 101 to Astoria,  
18 Oregon, where it then traveled east on Highway 30. The vehicle traveled on Highway 30  
19 until taking the exit for Highway 433 into Longview, Washington. Had the vehicle  
20 remained on Interstate 5, the travel time would have been about four hours; the route  
21 taken instead took about six-and-a-half hours. Additionally, during the surveillance,  
22 investigators observed the driver make multiple counter surveillance measures, such as  
23 exiting the main roadway to take side streets without making any prolonged stops only to  
24 re-enter the highway. Investigators initiated a traffic stop in Longview, Washington, and  
25 identified Shana BOBO as the driver. A male identified as Kyle Gojio was the  
26 passenger; investigators found (during a safety pat-down) that he had a  
27 methamphetamine pipe in his pocket.  
28

73. After being advised of her *Miranda* rights, BOBO said she had traveled to California in a BMW before the car experienced mechanical difficulties. BOBO said she purchased the Ford Edge for \$3,500 a few days earlier, in California, from a “lady.” She claimed that they (she and Gojio) wanted to “see the coast.” When investigators pointed out that the trip had been taken during the evening hours (in total darkness), BOBO acknowledged she did not see much. Given the vehicle’s travel pattern/counter surveillance maneuvers, discovery of the methamphetamine pipe in Gojio’s pocket, BOBO’s untruthful statements regarding her recent purchase of the Ford Edge (investigators had seen BOBO driving the vehicle in Washington more than a week earlier), Det. Anderson deployed his K9 Piper to the exterior of the vehicle. Piper gave a positive alert for the odor of narcotics. Investigators asked BOBO if she would consent to a search of the vehicle, and she said she would not. She told investigators to get “a search warrant.”

74. BOBO and Gojio were allowed to remove two small dogs from the vehicle; Gojio was allowed to remove his cell phone, jacket, and backpack. BOBO’s two cell phones (one of which she said was a personal phone and the other of which she said was for work – she stated she worked “under the table” for a Vietnamese family in Seattle) and paperwork from her purse were secured inside the vehicle, pending application for a search warrant. Detectives released Gojio and BOBO from the scene in the early morning hours of March 18, 2020.

75. Clark County Superior Court Judge Collier authorized the search of the Ford Edge, and investigators executed the warrant in the afternoon of March 18, 2020. During the search, K9 Piper again provided a positive alert, near the rear bumper, where investigators could see numerous screws missing. Once investigators removed the bumper, they found 25 pounds of methamphetamine concealed in a hidden compartment. Investigators removed their own GPS tracking device and observed another device/speaker (similar to the one in Brittney JONES’ Nissan Rogue) hard-wired to the Ford Edge’s power supply.



*Linkage of SA-1 to the March 17, 2020, Traffic Stop and Seizure*

76. On April 15, 2020, Clark County Superior Court Judge Collier authorized a second search warrant for records from to SA-1 between the dates of February 15, 2020, and April 15, 2020. Detectives received the records from Facebook on May 4, 2020. A review of these records showed frequent and ongoing communication between SA-1 and other DTO members, to include Brittney JONES and BOBO. The following paragraphs detail some of the communications received through this second search warrant.

77. BOBO utilized a Facebook profile with username "Shana Kalberer" to regularly communicate with SA-1 through Facebook messenger, to include exchanging nude videos and photos. As noted above, "Shana Kalberer" is a listed alias name on BOBO's criminal history. Additionally, investigators were able to attribute the "Shana Kalberer" Facebook profile to BOBO through comparison of BOBO's DOL photo to photos on the profile. It should also be noted that the account ID for the account is 100011395899599, and that the display user name was changed from "Shana BeauBeaux" to "Shana Kalberer," I believe in an attempt to avoid detection by law enforcement. On February 22, 2020, at 6:57pm UTC (10:57am PST), SA-1 asked BOBO to wire \$800.00 to a person in Albuquerque, New Mexico.

78. On March 9, 2020, at 5:02am UTC (10:02pm PDT on March 8, 2020), Jorge Espino told SA-1, "they are in Roseburg, about 2 hours below Eugene." Jorge Espino and SA-1 continued to talk about the location of "them." SA-1 then asked for a picture. Jorge Espino then sent a satellite map view depicting the icon of a red vehicle (labeled "Edge") parked off Creekside Rd next to Interstate 5. A second photo showed the icon of the vehicle labeled "Edge" near Roseburg, heading southbound on Interstate 5. As noted above, investigators would later find a GPS/audio device inside the Ford Edge, which I believe allowed Jorge Espino to track its location.

79. On March 16, 2020 at 8:05am UTC (1:05am PDT), BOBO told SA-1 they were "driving and about to pull into some ghetto hotel in 2 miles." SA-1 replied, "ok good." BOBO responded, "you worried? We are good. You can sleep now."

80. On March 17, 2020, at 8:31am UTC (1:31am PDT), SA-1 asked Jorge Espino, "where is she?" At 12:14pm UTC (5:14am PDT) Jorge Espino replied and said, "its just arriving in Longview." About an hour later at 1:15pm UTC (6:15am PDT), Jorge Espino said, "it's a failure brother, she is at the same place as the other." I believe Jorge Espino was likely referring to the fact that detectives stopped the Ford Edge and subsequently towed the vehicle to the Clark County Sheriff's Office facility (the same location where they towed Brittney JONES' vehicle in November 2019). At 1:34pm UTC (6:34am PDT), SA-1 asked, "how?" Five minutes later (1:39pm UTC / 6:39am PDT), SA-1 said, "but that one (a female) was not there"... "she arrived at her home" ... "the donkey"... "[she] only went to drop off the money and returned home." At 1:58pm UTC (6:58am PDT), SA-1 sent a message to Brittney JONES that read, "does it appear if they have been detained?" (This message was sent after BOBO and Gojio had been released from the scene of the traffic stop.) Brittney JONES replied, "not my brother." SA-1 then asked Brittney JONES about her brother's friend, and Brittney JONES said the male did not appear to be in jail. SA-1 told Brittney JONES the female called him from a different number. I believe this exchange shows that Brittney JONES' brother, Brent JONES, likely had some involvement in the March 17, 2020, seizure. I also believe it is possible that Gojio may be friends with Brent JONES, and that the "female" calling from a different number might have been BOBO calling SA-1 from Gojio's phone.

81. On March 17, 2020, at 5:17pm UTC (10:17am PDT), SA-1 told Rocio Gomez, "its gone to shit again up there." Gomez asked, "what happened now?" SA-1 then said, "they got the other car my love." SA-1 went on to say, "they were almost there where they were supposed to arrive...they didn't take them, but they took the car." I believe this referred to the fact that law enforcement did not arrest BOBO and Gojio, but seized the car. At 9:46pm UTC (2:46pm PDT), Rocio Gomez asked, "did you change your phone number?" SA-1 said, "yes my love, I changed it." Based on my training and experience, I am aware that drug traffickers frequently change their phone numbers. This is especially true after a substantial seizure of narcotics or US currency.



1           82. SA-1 later asked Jorge Espino for an update on the vehicle. On March 19,  
2 2020, at 12:08am UTC (5:08pm on March 18, 2020), Jorge Espino told SA-1 the vehicle  
3 was moved for about an hour and a half, and then it moved back to the corner. This is  
4 consistent with the timeline of CVRDTF investigators' execution of the search warrant  
5 on the Ford Edge inside of a garage bay prior to returning it to its place in the  
6 maintenance yard for storage.

7           83. On March 25, 2020, at 7:54pm UTC (12:54pm PDT), about a week after  
8 the traffic stop and seizure of methamphetamine described above, BOBO sent SA-1 three  
9 photographs of law enforcement standing near the Ford Edge after the vehicle was seized  
10 and after BOBO and Gojio were released from the scene.

11           84. On April 5, 2020, at 5:43am UTC (10:41pm on April 4, 2020), SA-1 asked  
12 Brittney JONES for the telephone number of someone named "Jose Luis." Brittney  
13 JONES later sent a screen shot showing the name "Joseluis Dominguez," and another  
14 screen shot showing a conversation with "Joseluis" and telephone number 360-721-4156.  
15 In the same screen shot, it appeared Brittney JONES gave Joseluis the telephone number  
16 661-903-2417 as Cosme SANCHEZ-ESPINO's phone number, and asked Joseluis to call  
17 SANCHEZ-ESPINO. In a subsequent message, SA-1 told Brittney JONES he was  
18 finally able to reach him and was talking to him. According to routine record checks,  
19 telephone number 360-721-4156 is associated with a Jose Ramirez at 8917 NE 15th Ave,  
20 H82, Vancouver, Washington. Washington DOL records show a Jose Luis Ramirez Cruz  
21 reporting a prior address of 8917 NE 15th Ave, and current address of 2517 NE 127th  
22 Ave, Vancouver, Washington. Based on this information, I believe "Joseluis Dominguez"  
23 is likely Jose Luis Ramirez Cruz.

24           85. On April 5, 2020, at 6:41am UTC (11:41pm on April 4, 2020), SA- 1 told  
25 Brittney JONES he spoke with the "fat one" (believed to be Joseluis/Jose Luis Ramirez  
26 Cruz). SA-1 stated that he (Joseluis) said he has a friend who will go transport drugs, and  
27 that the friend has a ranch on the "other side" where they can keep the stuff (drugs).  
28 Brittney JONES replied and said she knows him (Joseluis).

*Interactions between SA-1 and SA-2*

86. In the materials provided by Facebook through the first search warrant, CVRDTF detectives saw that, on November 1, 2019, SA-1 started a conversation with the user of a Facebook profile page displaying the username "AV DIAZ," with unique Facebook ID 100027651644395 (SA-2). The Facebook profile for SA-2 shows the user is from Vancouver, Washington, with a listed hometown of La Union, Guerrero, Mexico. SA-2 is "tagged" in two photos by Facebook user "Berta Valdovinos." Based on my knowledge of the previous investigation that resulted in VALDOVINOS-DIAZ's current incarceration, I am aware that VALDOVINOS-DIAZ is from La Union, Guerrero, Mexico, and is married to Floriberta Valdovinos-Valle. I believe "Berta Valdovinos" is Floriberta Valdovinos-Valle, and believe that VALDOVINOS-DIAZ is the the user of SA-2.

87. On November 15, 2019, beginning at 5:59am UTC (9:59pm on November 14, 2019), SA-1 told SA-2 to tell "them" to make them "square like," so they fit, and SA-2 said, "ok" at 6:00am UTC (10:00pm on November 14, 2019). On November 16, 2019, at 7:19am UTC (11:09pm PST on November 15, 2019) SA-1 asked, "have you given them the girl's number so they come to an agreement so they meet up at one place at the same time?" SA-2, at 7:09am UTC (11:09pm PST) on November 15, 2019, provided an affirmative answer. One minute later, SA-2 then said he will send SA-1 a number, and to have the girl call it when she is two hours away. SA-1 replied at 7:11am UTC (11:10 pm PST) and said to give them her number and that they should call her now while she is driving.

88. On November 18, 2019, at 7:23am UTC (11:23pm on November 17, 2020), SA-1 told SA-2, "they stopped her." SA-1 said she was about 2 minutes from the house, and wrote, "she says they are using a dog." SA-1 also said she had her kids and her brother with her. SA-1 told SA-2 that everything was "fixed well." SA-2 then told SA-1 not to worry about it, and that everything would be fine. Based on the facts of this investigation, I believe SANCHEZ-ESPINO and VALDOVINOS-DIAZ were talking



1 about the November 17, 2019, stop of Brittney JONES and her brother, Brent JONES. I  
2 further believe that the November 15, 2019, messages described above were the  
3 coordination for the 57 pounds of methamphetamine that Brittney and Brent JONES were  
4 transporting inside Brittney JONES' Nissan Rogue.

5 89. On January 6, 2020, at 2:17am UTC (6:17pm PST on January 5, 2020),  
6 SA-1 sent a message to SA-2 that read, "they arrived all is good." This is consistent with  
7 the information in a law enforcement database putting the Ford Edge (with California  
8 license 8NPM751) in California on January 4, 2020. I believe this was referring to the  
9 successful transport of drugs from California to Western Washington.

10 90. In a conversation thread beginning on February 6, 2020, at 3:58am UTC  
11 (7:58pm PST on February 5, 2020), SA-2 sent SA-1 the address of "508 W 33rd St  
12 Vancouver Wa 98660." SA-1 told SA-2 what tools would be needed, specifically a  
13 socket wrench size 5.5 (7.16 metric) and a small Philips screwdriver, to open a vehicle  
14 trap. Later during this conversation SA-2 asked if the "white girl" was going there for  
15 the money.

16 91. On February 7, 2020, at 7:11am UTC (11:11pm PST on February 6, 2020),  
17 SA-2 sent telephone number 626-510-5960 to SA-1 and told SA-1 to have "them" call  
18 that number and make arrangements to meet. The user of the listed phone number  
19 appears to be the person meeting whomever SA-1 was sending. SA-2 told SA-1 at  
20 7:17am UTC (11:17pm PST on February 6, 2020) it was in Long Beach. I believe  
21 VALDOVINOS-DIAZ was facilitating a drug delivery in Long Beach, California,  
22 between the user of 626-510-5960 and SANCHEZ-ESPINO's couriers. As described  
23 above, a law enforcement database showed that on February 8 and 9, 2020, the Ford Edge  
24 (bearing California plate 8NPM751) was in California, and other messages recovered  
25 from SA-1 indicated that SA-1 and Jorge Espino were discussing individuals driving to  
26 California to pick up a load of narcotics in this same timeframe.

27 92. On April 28, 2020, Clark County Superior Court Judge Collier authorized a  
28 search warrant for Facebook records related to SA-2 dated between November 1, 2019,

1 and April 28, 2020. Detectives served the warrant on April 29, 2020, and received the  
2 requested records on May 8, 2020.

3 93. An initial review of the records has revealed VALDOVINOS-DIAZ  
4 identifying himself in messages as the user of SA-2, including by sending photographs of  
5 himself. Investigators have also observed conversations between VALDOVINOS-DIAZ  
6 (using SA-2) and accounts believed to belong to VALDOVINOS-DIAZ's children  
7 wherein VALDOVINOS-DIAZ is referred to as "dad." The records also showed SA-2  
8 has been active since July 29, 2018.

9 94. Based on my training and experience, I am aware that Facebook accounts  
10 are capable of being linked to cellular phone numbers. SA-2 is linked to cellular phone  
11 number 971-218-1913. This number has been attributed to VALDOVINOS-DIAZ in the  
12 course of this investigation, including a March 2019 consensually recorded phone call  
13 placed to the number by an individual cooperating with law enforcement. At the time of  
14 the phone call, the individual was cooperating with the government in hopes of receiving  
15 consideration on state charges. The context of this call was to schedule a delivery of ten  
16 pounds of methamphetamine at a price of \$2,500 per pound. This delivery never  
17 occurred, due to safety concerns. Moreover, the individual's cooperation with law  
18 enforcement ended after s/he was found to be engaging in unauthorized drug transactions.

19 95. Given the above facts, I believe there is probable cause to believe that  
20 Cosme SANCHEZ-ESPINO and Alfredo VALDOVINOS-DIAZ are using SA-1 and SA-  
21 2, respectively, for drug-related purposes, and will continue to use SA-1 and SA-2,  
22 respectively for the same purposes. I further believe that SA-1 and SA-2 will contain  
23 information related to SANCHEZ-ESPINO and Alfredo VALDOVINOS-DIAZ's drug  
24 trafficking activities in Western Washington and elsewhere, and will help agents to  
25 identify other members of the VALDOVINOS-DTO.

26 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

27 96. I anticipate executing this warrant under the Electronic Communications  
28 Privacy Act, in particular Title 18, United States Code, Sections 2703(a), 2703(b)(1)(A)



1 and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the  
2 government copies of the records and other information (including the content of  
3 communications) particularly described in Section I of Attachment B. Upon receipt of  
4 the information described in Section I of Attachment B, government-authorized persons  
5 will review that information to locate the items described in Section II of Attachment B.

6 97. As indicated in the Application and Order for Non-Disclosure that  
7 accompany this affidavit, the government requests, pursuant to the preclusion of notice  
8 provisions of Title 18, United States Code, Section 2705(b), that Facebook be ordered not  
9 to notify any person (including the subscriber or customer to which the materials relate)  
10 of the existence of this warrant for such period as the Court deems appropriate, not to  
11 exceed one year. The government submits that such an order is justified because  
12 notification of the existence of this Order would seriously jeopardize the ongoing  
13 investigation. Such a disclosure would give the subscriber an opportunity to destroy  
14 evidence, change patterns of behavior, notify confederates, or flee from prosecution.  
15 Notifying our targets of the existence of this investigation will likely cause them to  
16 destroy evidence, flee the jurisdiction, or alter their methods, thus making it more  
17 difficult to dismantle the organization effectively. Notice also could put individuals  
18 assisting the government and agents in danger. For all the same reasons, I am requesting  
19 that the Court allow the government to delay notification of this warrant for the same  
20 period, not to exceed one year.

21 98. It is further respectfully requested that this Court issue an order sealing all  
22 papers submitted in support of this application, including the application and search  
23 warrant, until further order of the Court, for a period not to exceed one year. I believe  
24 that sealing this document is necessary because the items and information to be searched  
25 and seized are relevant to an ongoing investigation. Premature disclosure of the contents  
26 of this Affidavit and related documents may have a significant and negative impact on the  
27 continuing investigation and may severely jeopardize its effectiveness.  
28

**COMMON CHARACTERISTICS OF DRUG TRAFFICKERS**

99. Based on my training and experience, including experience obtained through participation in this and other investigations involving the distribution of controlled substances, including those targeting long-term conspiracies responsible for the distribution of controlled substances, and based upon my consultation with other experienced law enforcement agents and officers, I know that:

a. Drug trafficking conspiracies, especially those involving large amounts of narcotics and interstate shipments, usually take place over several months or years, and continue to operate even when enforcement activity results in arrests and/or seizures of drugs and/or money.

b. I know narcotics traffickers often require the use of one or more communication facilities to negotiate times, places, schemes, and manners for importing, possessing, concealing, manufacturing, and distributing controlled substances and for arranging the disposition of proceeds from the sale of controlled substances. I know international and domestic narcotics trafficking organizations often depend on maintaining timely long-distance and local connections between original sources of supply and those down the organizational chain. Narcotics traffickers utilize a variety of communication methods, including telephone communications, encrypted and unencrypted messaging applications, and email. Among other techniques, I know that drug traffickers sometimes use Facebook Messenger to conduct such communications.

**CONCLUSION**

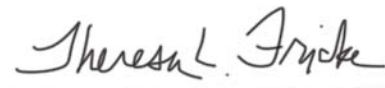
100. Based upon the information which has been uncovered during the course of this investigation, and on the advice, experience, knowledge of other agents and officers involved in this investigation, I believe these facts establish probable cause to conclude that the SUBJECT ACCOUNTS have been used, and will continue to be used, to facilitate violations of the Controlled Substances Act, specifically distribution of narcotics, conspiracy, and related offenses in the Western District of Washington, and



1 101. As noted above, I am assigned to the FBI's Vancouver, Washington, office.  
2 Thus, I am submitting this affidavit and application electronically in accordance with  
3 Local Criminal Rule 41(d)(3).  
4

5  
6   
7 SEAN THORNTON, Affiant  
8 Special Agent  
9 Federal Bureau of Investigation

10 The above-named agent provided a sworn statement to the truth of the foregoing  
11 affidavit by telephone on the 17th day of September, 2020.  
12

13   
14 THERESA L. FRICKE  
15 United States Magistrate Judge  
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**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with the accounts listed below (the “SUBJECT ACCOUNTS”) for all such information that is stored at premises owned, maintained, controlled, or operated by Facebook, a company headquartered in Menlo Park, California. This warrant is limited to information created after the specified dates:

- **SUBJECT ACCOUNT-1:** Facebook user ID 100028611992719, registered under the name JOSE LOPEZ, from April 15, 2020 to the present; and
- **SUBJECT ACCOUNT-2:** Facebook user ID 100027651644395, registered under the name AV DIAZ, from April 20, 2020 to the present.



**ATTACHMENT B****Particular Things to be Seized****I. Information to be disclosed by Facebook**

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under Title 18, United States Code, Section 2703(f), Facebook is required to disclose the following information to the government for the user ID listed in Attachment A (the "SUBJECT ACCOUNTS"):

A. The following information about the customer or subscriber of the SUBJECT ACCOUNTS:

- (a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- (b) All activity logs for the SUBJECT ACCOUNTS and all other documents showing the user's posts and other Facebook activities;
- (c) All photos and videos in their original format, including EXIF information (metadata), uploaded by that user ID and all photos and videos in their original format, including EXIF information (metadata), uploaded by any user that have that user tagged in them;
- (d) All other records of communications and messages made or received by the user, including all private messages, chat history, calling history, and pending "Friend" requests;
- (e) All "check ins" and other location information;
- (f) All IP logs, including all records of the IP addresses that logged into the SUBJECT ACCOUNTS;

- (g) All past and present lists of friends created by the SUBJECT ACCOUNTS;
  - (h) All records of Facebook searches performed by the SUBJECT ACCOUNTS;
  - (i) The length of service (including start date);
  - (j) The means and source of payment for such service (including any credit card or bank account number) and billing records;
  - (k) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken;
  - (l) Names (including subscriber names, Facebook user IDs, and screen names);
  - (m) Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
  - (n) Local and long distance telephone connection records;
  - (o) Linked accounts; and
  - (p) Telephone or instrument numbers or identities (including MAC addresses).
- B. All records and other information (not including the contents of communications) relating to the SUBJECT ACCOUNTS, including:
- (a) Records of user activity for each connection activity for each connection made to or from the SUBJECT ACCOUNTS, including log files; messaging logs; the date, time, length, and method of connections; data transfer volume; user names; and source and destination of Internet Protocol addresses;
  - (b) Information about each communication sent or received by the SUBJECT ACCOUNTS, including the date and time of the communication, the method of the communication (such as source and destination email addresses, IP addresses, and telephone numbers); and



- 1 (c) Records of any Facebook accounts that are linked to the SUBJECT  
2 ACCOUNTS by machine cookies (meaning all Facebook user IDs that  
3 logged into Facebook by the same machine or device as the SUBJECT  
4 ACCOUNTS).

5 **II. Information to be seized by the government**

6 All information described above in Section I that relates to the ongoing narcotics  
7 investigation described in the Affidavit (i.e., felony violations of Title 21, United States  
8 Code, Sections 841(a)(1) and 846, Distribution of and Conspiracy to Distribute  
9 Controlled Substances), including, for the user IDs identified on Attachment A,  
10 information pertaining to the following matters:

- 11 (a) any and all Wall Posts, private messages, status updates, chat history, friend  
12 requests, postings, photographs, or any other information, records, or other  
13 material or information that relates to drug trafficking, or activity related to  
14 or in furtherance of drug trafficking;
- 15 (b) any and all IP logs, including all records of the IP addresses that logged  
16 into the account, and the dates and times such logins occurred, as well as  
17 any other connection information;
- 18 (c) records relating to who created, used, or communicated with the user ID,  
19 including records about their identities and whereabouts;
- 20 (d) financial records and information, including but not limited to money  
21 transfers or wires;
- 22 (e) information identifying the names, location, or other contact information of  
23 people in contact with suspected drug traffickers;
- 24 (f) Any content including e-mails, messages, texts, photographs (including  
25 metadata), videos (including metadata), visual images, documents,  
26 spreadsheets, address lists, contact lists or communications of any type  
27 which could be used to identify the user and or their location.  
28

- 1 (g) Records relating to who created, used, or communicated with the user ID,  
2 including records about their identities and whereabouts;
- 3 (h) any information, records, or other material relevant to the whereabouts of  
4 the user of each of the SUBJECT ACCOUNTS;
- 5 (i) All subscriber records associated with the SUBJECT ACCOUNTS,  
6 including name, address, local and long distance telephone connection  
7 records, or records of session times and durations, length of service  
8 (including start date) and types of service utilized, telephone or instrument  
9 number or other subscriber number or identity, including any temporarily  
10 assigned network address, and means and source of payment for such  
11 service including any credit card or bank account number;
- 12 (j) Any and all other log records, including IP address captures, associated  
13 with the SUBJECT ACCOUNTS; and
- 14 (k) Any records of communications between Facebook and any person about  
15 issues relating to the account, such as technical problems, billing inquiries,  
16 or complaints from other users about the SUBJECT ACCOUNTS. This is  
17 to include records of contacts between the subscriber and the provider's  
18 support services, as well as records of any actions taken by the provider or  
19 subscriber as a result of the communications.
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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS  
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, \_\_\_\_\_, attest, under penalties of perjury  
under the laws of the United States of America pursuant to Title 28, United States Code,  
Section 1746, that the information contained in this declaration is true and correct. I am  
employed by Facebook, and my official title is \_\_\_\_\_. I am  
a custodian of records for Facebook. I state that each of the records attached hereto is the  
original record or a true duplicate of the original record in the custody of Facebook, and  
that I am the custodian of the attached records consisting of \_\_\_\_\_  
(pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the  
occurrence of the matter set forth, by, or from information transmitted by, a person with  
knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business  
activity of Facebook; and
- c. such records were made by Facebook as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the  
Federal Rules of Evidence.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature